

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

MICHAEL HACKLEY ARCHITECTS,
P.C. AND MICHAEL HACKLEY,

Plaintiffs,

V.

LVLX, INC., JOHN LEE,
COMMERCIAL FINISH GROUP,
INC. AND JEFFREY WAY, and
JOHN TROUTON

Defendants.

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Civil Action No. JFM 02 CV 3363
Jury Trial Demanded

**DEFENDANT COMMERCIAL FINISH GROUP, INC.'S
RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

TO: Plaintiffs, Michael Hackley Architects, P.C. and Michael Hackley, by and through their attorney of record, Deborah J. Westervelt, Law Offices of Royal W. Craig, P.C., 10 North Calvert Street, Suite 153, Baltimore, MD 21202

Defendant, Commercial Finish Group, Inc. ("Defendant"), hereby objects and responds to Plaintiffs' First Set of Interrogatories to Defendant Commercial Finish Group, Inc. as follows:

Objections to Instructions and Definitions

1. Defendant objects to definition 1 because it is overly broad and invades the attorney-client privilege and attorney work product immunity. Defendant will define the defined term as it currently exists.

2. Defendant objects to definition 2 because it is overly broad.

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and the persons who were present when said drawings were presented to Prince George's County.

RESPONSE: CFG believes that the decision was made by LVL X, Inc. CFG does not know who at LVL X, Inc. made the decision. The redacted drawings were delivered to Prince George's County by Ron Reese, CFG's superintendent and discussed with Suzanne Hall, an employee of the county.

INTERROGATORY NO. 18: With regard to the decision to resubmit the Hackley Drawings to Prince George's County for permit with Michael Hackley's name and seal redacted and Jeffrey Way's name and seal, identify the person or persons who made the decision and the persons who were present when said drawings were presented to Prince George's County.

RESPONSE: CFG believes that the decision was made by LVL X, Inc. CFG does not know who at LVL X, Inc. made the decision. The redacted drawings were delivered to Prince George's County by Ron Reese, CFG's superintendent and discussed with Suzanne Hall, an employee of the county.

INTERROGATORY NO. 19: Identify the person or persons responsible for instructing and/or directing you on the construction of the Prince George's County LVL X store as well as the content of those instructions.

RESPONSE: CFG objects to the portion of the interrogatory requiring CFG to detail the content of instructions because such request is overly broad and unduly burdensome. Subject to such objections, CFG answers as follows: John Lee, Jason Bonnett and Bob Spruill provided instructions and direction to CFG. Many of the communications between CFG and LVL X, Inc.'s employees are reflected in the documents contained in CFG's job notebooks to which you are referred for further answer.

INTERROGATORY NO. 20: Identify any and all documents in Defendant's possession that support Defendant's Twelfth Defense that any use of a trademark owned by Plaintiffs was done with permission by a license agreement by Plaintiffs.

RESPONSE: See the contract between CFG and LVL X attached hereto.

INTERROGATORY NO. 21: Identify any and all documents in Defendant's possession that support Defendant's Tenth Defense that any use made by Defendant of any drawings or design of the Plaintiffs constituted fair use.

DEFENDANT COMMERCIAL FINISH GROUP, INC.'S RESPONSE TO PLAINTIFF'S FIRST SET OF INTERROGATORIES